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16 Attorneys for Plaintiff

17 UNITED STATES DISTRICT COURT  
18 DISTRICT OF NEVADA

19 HEATHER SLOANE,  
20  
21 Plaintiff,

22 vs.

23 STATE FARM MUTUAL AUTOMOBILE  
24 INSURANCE COMPANY, an insurance  
25 company; and DOES 1-25 and XYZ  
26 Corporations, inclusive,  
27 Defendants.

Case No. 3:19-cv-00648-MMD-WGC

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME TO FILE  
OPPOSITION TO DEFENDANT'S  
MOTION TO DISMISS, OR IN THE  
ALTERNATIVE, TO  
SEVER/BIFURCATE AND TO STAY  
CLAIMS FOR BAD FAITH (Second  
Request)**

28 The parties hereto, by and through their undersigned counsel, hereby stipulate and agree that, due to a family emergency, Plaintiff, HEATHER SLOANE, may have a seven (7) day extension to file her Opposition to *Defendant's Motion to Dismiss, or in the Alternative, to Sever/Bifurcate and to Stay Claims for Bad Faith*. Accordingly, Plaintiffs shall have up to and including Monday, December 2, 2019, to file the Opposition to *Defendant's Motion to Dismiss, or in the Alternative, to Sever/Bifurcate and to Stay Claims for Bad Faith*.

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**DATED** this 18th day of November, 2019.

**ROSE LAW OFFICE**

/s/ Sean P. Rose  
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In Association with:

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Attorney for Defendant

**ORDER**

**IT IS SO ORDERED.**

**DATED** this 2nd day of December, 2019.



UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that I am an employee of the Rose Law Office and that on the date indicated below, I served a true copy of the foregoing ***Stipulation and [Proposed] Order to Extend Time to File Opposition to Defendant's Motion to Dismiss, or in the Alternative, to Sever/Bifurcate and to Stay Claims for Bad Faith*** and on the party(s) set forth below by:

\_\_\_\_\_ Placing an original or true copy thereof in a sealed envelope, postage prepaid for collection and mailing in the United States Mail, at Reno, Nevada

\_\_\_\_\_ Hand Delivery

\_\_\_\_\_ Facsimile

☒ All parties signed up for electronic filing have been served electronically, all others have been served by placing a true copy thereof in a sealed envelope for collection and mailing in the United States mail, at Reno, Nevada, postage prepaid, following ordinary business practices

addressed as follows:

Michael Pintar, Esq.  
McCormick, Barstow, Sheppard, Wayte & Carruth LLP  
Michael.pintar@mccormickbarstow.com  
241 Ridge St., Ste. 300  
Reno, NV 89501

**DATED** this 18<sup>th</sup> day of November, 2019

/s/ Stacey Stallings  
Stacey Stallings